

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

**WILL McRANEY**

**PLAINTIFF**

**V.**

**No. 1:17cv080-GHD-DAS**

**THE NORTH AMERICAN MISSION BOARD  
OF THE SOUTHERN BAPTIST CONVENTION, INC.**

**DEFENDANT**

**CONSENT MOTION TO ENTER STIPULATED ORDER  
REGARDING CONFIDENTIALITY OF THIRD-PARTY DOCUMENTS  
PRODUCED BY BCMD**

**COMES NOW** Respondent Baptist Convention of MD/DC, Inc. [“BCMD”], with the consent of Plaintiff and Defendant, to respectfully request that the Court enter a stipulated order regarding the confidentiality of third-party documents produced by BCMD. In support of this Motion, Respondent states:

1. Plaintiff Will McRaney and Defendant The North American Mission Board of the Southern Baptist Convention, Inc. have served subpoenas on BCMD, seeking documents in connection with the above-captioned litigation (the “Subpoenas”).

2. BCMD intends to produce certain documents in response to the Subpoenas, but wishes for its production, which contains confidential and proprietary ministerial, ecclesiastical, religious, business, and personnel information, to be subject to confidentiality protections.

3. The parties to this action consent to the entry of a Stipulated Order Regarding Confidentiality of Third-Party Documents Produced by BCMD, in the form attached hereto and incorporated by reference as Exhibit “1”, to govern the production of confidential information by BCMD.

4. Accordingly, BCMD moves for the entry of a Stipulated Order Regarding Confidentiality of Third-Party Documents Produced by BCMD, in the form attached hereto as Exhibit “1”.

5. Plaintiff Will McRaney and Defendant The North American Mission Board of the Southern Baptist Convention, Inc., consent to the entry of the Stipulated Order Regarding Confidentiality of Third-Party Documents Produced by BCMD.

**WHEREFORE**, Respondent BCMD respectfully submits that for good cause shown this consent motion be granted.

Respectfully submitted,

**BAPTIST CONVENTION OF  
MARYLAND/DELAWARE**

By Its Attorneys,

*/s/ Adam Stone*

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*/s/ Eric W. Gunderson*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of April, 2023, a copy of the foregoing Motion was served electronically on all counsel of record via the Court's ECF system.

*/s/ Eric W. Gunderson*

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Eric W. Gunderson, *Pro Hac Vice*